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U.S. Department of Justice

United States Attorney Southern District of New York

The Silvio J. Mollo Building One Saint Andrew's Plaza New York, New York 10007

MEMORANDUM ENDORSED

October 25, 2021

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By ECF

Honorable Gregory H. Woods United States District Judge Southern District of New York 500 Pearl Street New York, NY 10007

Re: United States v. Christian Irizarry, et. al., 20 Cr. 127 (GHW)

Dear Judge Woods:

The Government writes respectfully to request that the Court enter the attached proposed protective order, to which counsel for the defendants have consented. *See* Exhibit A.

Pursuant to Federal Rule of Criminal Procedure 16, "[a]t any time the court may, for good cause, deny, restrict, or defer discovery or inspection, or grant other appropriate relief." Fed. R. Crim. P. 16(d). The Government submits that good cause justifies the issuance of a protective order in this case given the nature of the material to be disclosed, which includes information concerning undercover drug purchases.

Accordingly, the Government respectfully requests that the Court enter the proposed order.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney
Southern District of New York

By: /s/ Ni Qian_

Ni Qian

Assistant United States Attorney

Tel: (212) 637-2364

cc: Counsel of Record (via ECF)

Application granted. The proposed protective order will be entered separately. The Clerk of Court is directed to terminate the motion pending at Dkt. No. 87. SO ORDERED.

Dated: October 26, 2021 New York, New York

GREGORY H. WOODS United States District Judge